Attorney Docket No.: 0190148

### **REMARKS**

This Amendment and Response is in response to the Non-Final Office Action of September 26, 2003, where the Examiner has rejected claims 1-20. By the present amendment, applicant has amended the abstract and the written description. Applicant has further cancelled claims 3, 7-15 and 18, and amended claims 1, 2, 4-6, 16-17 and 19-20. After the present amendment, claims 1, 2, 4-6, 16-17 and 19-20 are pending in the present application. An early Notice of Allowance for pending claims 1, 2, 4-6, 16-17 and 19-20 in view of the following remarks is respectfully requested.

### A. Object to the Abstract

The Examiner has objected to the abstract. By the present amendment, applicant has amended the abstract in compliance with the rules. Applicant respectfully submits that the Examiner's objection to the abstract has been overcome.

### В. Rejection of the Specification under 35 USC §112, ¶ 1

The Examiner has rejected the specification, under 35 USC §112, ¶ 1. By the present amendment, applicant has amended the specification to overcome all the rejections by the Examiner.

In response to the Examiner's comment regarding the term "B1" and the terms "b1m, b2m, ... b9m", and the equations given for B1 on page 11, applicant has amended the specification on pages 2 and 11. Applicant respectfully submits that the Examiner' rejection of the written specification has been overcome.

## C. Rejection of Claims 1, 4, 8, 9-10, 14-16 and 20 under 35 USC §103(a)

The Examiner has rejected claims 1, 4, 8, 9-10, 14-16 and 20, under 35 USC §103(a), as being unpatentable over Maurice (USPN 5,493,553) ("Maurice") in view of Koike (USPN 5,572,603) ("Koike").

By the present amendment, applicant has amended claim 1 to recite: "the processing circuitry performs cross talk correction on a first pixel during the first pass to generate a first cross talk corrected pixel ...; wherein, during the first pass, the processing circuitry stores the first cross talk corrected pixel in the line buffer circuitry, retrieves the first cross talk corrected pixel from the line buffer circuitry, and uses the first cross talk corrected pixel to perform cross talk correction on a second pixel to generate a second cross talk corrected pixel."

Applicant respectfully submits that Maurice discloses a conventional approach, where the first signal is cross talk corrected using the second signal and the third signal; however, Maurice fails to disclose, teach or suggest that either the second signal or the third signal itself is cross talk corrected before using such signal to cross talk correct the first signal. Maurice reads:

a cross-talk estimation circuit receiving at least one first signal (xj) coming directly or not directly from a first track (j), at least one second signal (xj-1) coming directly or not directly from a

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second track (j-1) located on one side of the first track (j), at least one third signal (xj+1) coming directly or not directly from a third track (j+1) located on the other side of the first track with respect to the second track, and computing a first cross-talk coefficient (Cjg) in taking the product of the first signal by the sign of the second signal and a second cross-talk coefficient by taking the product of the first signal by the sign of the third signal;

a cross-talk correction circuit (5) directly receiving the first signal, the second signal and the third signal and computing a cross-talk corrected signal by subtracting, from the first signal, the product of the first cross-talk coefficient by the second signal as well as the product of the second cross-talk coefficient by the third signal. (Col. 3, lines 20-37.)

In sharp contrast, claim 1, as amended, recites that "the processing circuitry performs cross talk correction on a first pixel during the first pass to generate a first cross talk corrected pixel ... and ..., during the first pass, ... uses the first cross talk corrected pixel to perform cross talk correction on a second pixel to generate a second cross talk corrected pixel." Applicant respectfully submits that claim 1, as amended, for example, finds support at page 12, line 4 through page 14, line 21. As explained in the present application, "... partially cross talk corrected pixel values are stored back to the line buffers as they are calculated and are used to perform cross talk correction in subsequent pixels, thereby giving even greater accuracy." (Page 12, lines 16-18.) As further, explained:

$$B1p = b1 *B1m - b2*G1p - b3*G5 - b4*G3p - b5*G4 - b6*R1p - b7*R2p - b8*R3 - b9*R4$$

This above equation is a better partially corrected B1p since other partially corrected neighboring pixels are used in calculating the partially corrected value of B1p. Therefore, this "single pass" method

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is superior to the single pass solution discussed above, though it is not truly single pass, in that, the pixels in the image are being cross talk corrected multiple times during the one pass over the image. (Page 13, lines 6-12.)

Applicant respectfully submits that cited references fail to disclose, teach or suggest that during the same pass, a pixel is cross talk corrected, stored and retrieved to be used to cross talk correct another pixel. At least for this reason, applicant respectfully submits that claim 1, as amended, and its dependent claims 2 and 4-6 should be allowed. Further, claim 16 has been amended to include limitations similar to those of claim 1, as amended and, thus, claim 16 and its dependent claims 17 and 19-20 should also be allowed.

# D. Rejection of Claims 2-7, 11-13 and 17-19 under 35 USC §112, ¶ 1

The Examiner has rejected 2-7, 11-13 and 17-19 under 35 USC §112, ¶ 1, as failing to comply with the enablement requirement.

By the present amendment, applicant has cancelled claims 3, 7, 11-13 and 18. Accordingly, applicant respectfully submits that rejection of claims 3, 7, 11-13 and 18 has been rendered moot. Further, applicant has amended claims 2, 4-6, 16-17 and 19-20, and respectfully submits that claims 2, 4-6, 16-17 and 19-20, as amended, for example, find support at page 12, line 4 through page 14, line 21. Applicant respectfully submits that the Examiner's rejection of claims 2, 4-6, 16-17 and 19-20 has been overcome.

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### E. Conclusion

Based on the foregoing reasons, an early Notice of Allowance directed to all claims 1, 2, 4-6, 16-17 and 19-20 pending in the present application is respectfully requested.

Applicant would like to advise the Examiner of a recent change in the attorneys of record. Applicant respectfully requests that all correspondence regarding the present application be made to the address shown below.

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**CERTIFICATE OF MAILING** 

I hereby certify that this correspondence is being deposited with the United States Postal Service "First Class Mail Post Office to addressee" Service under 37 C.F.R. Sec. 1.10 addressed to: Commissioner for Patents, P. O. Box 1450, 

LESLEY L. LAM

Signature